

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

LAURIE PYNE,

Plaintiff,

V.

CENTRALIA COLLEGE, a state community college; ROBERT MOHRBACHER, individually and in his official capacity as the Chief Executive Officer of Centralia College; JANE DOE MOHRBACHER, husband and wife and the marital community composed thereof; WASHINGTON STATE DEPARTMENT OF CORRECTIONS, a Washington Agency; DAN WHITE, individually and in his official former capacity as the Superintendent of Washington Corrections Center; CHERYL STRANGE, individually and in her official capacity as the Secretary of the Department of Corrections; and JANE AND JOHN DOES.

## Defendants.

TO: CLERK OF THE COURT, UNITED STATES DISTRICT COURT,  
WESTERN DISTRICT OF WASHINGTON AT TACOMA

AND TO: Joy M. Lockerby, Attorneys for Plaintiff

Defendants Centralia College, Robert Mohrbacher, Washington State Department of Corrections, Dan White, and Cheryl Strange (“Defendants”), by and through their counsel of , remove this action from the Superior Court, State of Washington, County of Lewis, to the United States District Court for the Western District of Washington, Tacoma Division. Pursuant

## NOTICE OF REMOVAL - 1

PACIFICA LAW GROUP LLP  
1191 SECOND AVENUE  
SUITE 2000  
SEATTLE, WASHINGTON 98101-3404  
TELEPHONE: (206) 245.1700  
FACSIMILE: (206) 245.1750

1 to 28 U.S.C. § 1446(a), a short and plain statement setting forth the grounds for removal follows.

2 1. On October 18, 2024, Plaintiff Laurie Pyne filed this action in the Lewis County  
 3 Superior Court, which assigned it Cause No. 24-2-0106221. *See* Ex. 1. Removal to this Court is  
 4 appropriate because this Court is the United States District Court for the district and division  
 5 embracing the place where the state court action is pending. *See* 28 U.S.C. § 1441(a); LCR 3(e).

6 2. Plaintiff served Defendants on October 18, 2024, when Plaintiff served the  
 7 Complaint via hand delivery. *See* RCW 4.28.080(1). Notice of removal is timely when it is “filed  
 8 within 30 days after the receipt by the defendant, through service or otherwise, . . . or within 30  
 9 days after the service of summons upon the defendant.” 28 U.S.C. § 1446(b)(1). Under Fed. R.  
 10 Civ. P. 6(a)(1), “if the last day is a . . . Sunday . . . the period continues to run until the end of the  
 11 next day that is not a Saturday, Sunday, or legal holiday.” Here, 30 days after Defendants were  
 12 served was November 17, 2024. Because November 17 was a Sunday, the period for removal  
 13 extended to the next day, which is Monday, November 18. *See Gronquist v. Cunningham*, 747 F.  
 14 App’x 532, 534 (9th Cir. 2018); *McConnell & Malek Enters. v. Proof Mark, Inc.*, No. 23-cv-  
 15 00010-LJC, 2023 WL 3688094, at \*3 (N.D. Cal. May 25, 2023). Thus, this notice, filed on  
 16 November 18, is timely and appropriate.

17 3. Pursuant to 28 U.S.C. § 1331, this Court has original jurisdiction over one of  
 18 Plaintiff’s 15 causes of action—Count J.6, as that Count arises under the laws of the United States,  
 19 specifically, 42 U.S.C. § 1983 and the First Amendment of the United States Constitution. *See* Ex.  
 20 1 ¶¶ 4.146–51. Pursuant to 28 U.S.C. § 1337(a), supplemental jurisdiction exists for Plaintiff’s  
 21 remaining Washington State common law claims for breach of contract, breach of good faith and  
 22 fair dealing, and wrongful termination; statutory claims under Wash. Rev. Code § 42.52 for wage  
 23 theft and under Wash. Rev. Code § 49.60 for retaliation, discrimination for perceived physical  
 24 impairment, religious discrimination, and disparate treatment; and constitutional claims for a

1 violation of the takings clause, art. I, § 16, invasion of privacy, art. I, § 7, deprivation of life, liberty,  
 2 or property, art. I, § 3, infringement of freedom of conscience, art. I, § 11, and a violation of equal  
 3 protection, art. I, § 3. Plaintiff's state law claims directly relate to the controversy pleaded in  
 4 Plaintiff's § 1983 claim because they all stem from her termination of employment for failing to  
 5 take the COVID-19 vaccine.

6. Removal to this Court is also appropriate because it has personal jurisdiction over  
 7 Plaintiff and Defendants. There are no other identified defendants in this matter, therefore consent  
 8 is not required.

9. In compliance with 28 U.S.C. § 1446(a) and LCR 101(b), Defendants have attached  
 10 a true, correct, and complete copy of the complaint, Exhibit 1; a certificate of service listing all  
 11 counsel who have appeared in the action, with their contact information, including email address,  
 12 Exhibit 2; and, a complete copy of all process, pleadings, and orders filed by or served upon  
 13 Defendants in the underlying action, Exhibit 3. In providing Exhibits 1–3, defense counsel further  
 14 certify compliance with LCR 101(c).

15. In compliance with 28 U.S.C. § 1446(d), a copy of this Notice (without exhibits),  
 16 will be filed with the King County Superior Court and contemporaneously served upon Plaintiff.

17. A Notice of Related Cases is filed contemporaneously with this Notice of Removal.

18. Defendants intend no admission of fact, law, or liability by this Notice of Removal,  
 19 and expressly reserve all cognizable defenses, motions, rights, and pleas.

20 DATED this 18th day of November, 2024.

21 PACIFICA LAW GROUP LLP

22 s/ Ian D. Rogers  
 23 Ian D. Rogers, WSBA #46584

24 s/ Meha Goyal  
 25 Meha Goyal, WSBA #56058

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Attorneys for Defendants Centralia College,  
Robert Mohrbacher, Washington State  
Department of Corrections, Dan White, and  
Cheryl Strange

## CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2024, I electronically filed the foregoing document with the Clerk of the United States District Court, Western District of Washington, using the CM/ECF system and also sent a true and correct copy of this filing, via electronic mail, per agreement, to counsel for plaintiff listed below.

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*Attorneys for Plaintiff*

DATED this 18th day of November, 2024.

## PACIFICA LAW GROUP LLP

s/ Meha Goyal  
Meha Goyal, WSBA #56058

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Robert Mohrbacher, Washington State  
Department of Corrections, Dan White, and  
Cheryl Strange*